

IN THE COURT OF COMMON PLEAS  
STARK COUNTY, OHIO

THE CRITTER COMPANY, INC.,	)	
	)	
Plaintiff,	)	CASE NO. 1996-CV-00615
	)	
-vs-	)	JUDGE HAAS
	)	
CANTON DROP FORGE, INC.,	)	
	)	
Defendant.	)	

RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES  
TO THE DEFENDANT, CANTON DROP FORGE, INC.

Now comes Defendant Canton Drop Forge, Inc. ("Defendant"), and hereby responds to Plaintiff's first set of interrogatories pursuant to Rule 33 of the Ohio Rules of Civil Procedure:

INTERROGATORIES

1. State the month and year Canton Drop Forge, Inc. constructed Lagoon No. 1.

ANSWER: Not known. Defendant believes it was constructed after December 30, 1942.

2. State the purpose for which Canton Drop Forge constructed Lagoon No. 1.

ANSWER: Collection and treatment of stormwater and plant process water.

3. State who constructed Lagoon No. 1.

ANSWER: U.S. Army Air Corps.

4. State how Lagoon No. 1 was constructed.

ANSWER: It was excavated or dug out by earthmoving equipment.

5. State whether documents exist regarding the creation of Lagoon No. 1.

ANSWER: To the best of our knowledge none exist.